

EXHIBIT 4

15:02:50 Q. Other than that?

15:02:53 A. He'd probably be all right.

15:03:02 Q. Okay. Now, showing you Exhibit 8,

4 this is a document entitled certification

5 pursuant to local rule 26.2 B and is that your

6 signature at the bottom of the page there, ma'am?

15:03:16 A. Yes, sir.

15:03:19 Q. When did you sign this?

15:03:22 A. I'm not sure when it was.

15:03:25 Q. To your best recollection, when did

11 you sign this?

15:03:33 A. I don't know.

15:03:35 Q. Was it in the last week or two or

14 could it have been a year or two ago?

15:03:41 A. It's been longer than that.

15:03:46 Q. Okay. Do you know whether it was

17 sometime this year, 2007?

15:04:00 A. It wasn't this year.

15:04:04 Q. Was it in -- was it in 2006?

15:04:07 A. I don't remember when it was done.

15:04:10 Q. Could it have been 2005 or 2004?

15:04:11 A. Possibly.

15:04:18 Q. And you, you say there that you

24 have discussed the scope of discovery in this

25 action with your counsel. Do you see that?

1 First sentence?

15:04:26 A. Uh-huh.

15:04:28 Q. You have to use words.

15:04:29 A. Yes.

15:04:30 Q. Thank you.

15:04:36 And do you know what discovery is?

15:04:48 A. I don't know how to put that into
8 words, but I'm sure I do know what that means.

15:04:55 Q. What to you is discovery in the
10 context of a lawsuit like this?

15:05:11 A. That they have found things that
12 were wrong.

15:05:22 Q. Does it mean anything else?

15:05:28 A. I don't know.

15:05:32 Q. And then in the, in the next
16 sentence, you say that you consent to any effort
17 to seek discovery events that exceed the
18 presumptive limits set forth in the Federal and
19 local rules of the United States district court
20 for the district of Massachusetts. Do you see
21 that?

15:05:54 A. Yes.

15:05:59 Q. And what, what does that mean, what
24 are discovery events?

15:06:03 A. I'm not sure.

15:06:08 Q. Well, is it your custom and
2 practice to sign things when you don't know what
3 they mean?

15:06:14 A. Well I know why I signed those.

15:06:18 Q. Why did you sign them?

15:06:28 A. Because we were not earning as much
7 as some of the others were on their stock.

15:06:45 Q. Any other reason?

15:06:45 A. It was wrong.

15:06:48 Q. So you signed this document,
11 Exhibit 8, for the same reason that you brought
12 the lawsuit; is that right?

15:06:58 A. For the same reason that we brought
14 the lawsuit?

15:07:00 Q. Isn't the reason that you brought
16 the lawsuit that you say people were getting a
17 better deal from Putnam than you were?

15:07:07 A. That's right.

15:07:09 Q. And isn't that why you just told me
20 you signed this document, Exhibit 8?

15:07:11 A. Yes.

15:07:18 Q. Can you identify any depositions
23 that your attorneys have taken in this case?

15:07:23 A. No.

15:07:24 Q. Do you know how many depositions

1 they've taken?

15:07:27 A. No.

15:07:28 Q. Do you know how many they want to

4 take?

15:07:29 A. No.

15:07:30 Q. Do you know why they're asking

7 permission to take additional depositions if they

8 are, in fact, asking that?

15:07:36 A. No.

15:07:36 Q. Do you know whether they are asking

11 for permission to take additional depositions?

15:07:40 A. No.

15:07:42 Q. Do you know when fact discovery

14 closes in this case?

15:07:43 A. No.

15:07:45 Q. Do you know when expert discovery

17 begins in this case?

15:07:46 A. No.

15:07:48 Q. Do you know when expert discovery

20 closes in this case?

15:07:49 A. No.

15:07:51 Q. Do you know of any experts that

23 your attorney haves retained for you in this

24 case?

15:07:56 A. No.

15:07:58 Q. Do you know whether your attorneys
2 have retained any experts in this case?

15:08:15 A. What do.

15:08:16 Q. Do you know if your?

15:08:17 A. I don't know. I don't know.

15:08:20 Q. Okay. If, if the case goes to
7 trial, who who's going to testify for your side?

15:08:30 A. I don't know.

15:08:30 Q. Do you know of anybody who's going
10 to testify for your side?

15:08:33 A. I don't know.

15:08:34 Q. Do you know if you're going to
13 testify for your side?

15:08:36 A. I don't know.

15:08:37 Q. Do you know if your husband's going
16 to testify for your side?

15:08:42 A. Don't know.

15:08:46 Q. Have you read the complaint that's
19 been filed for you in Federal district court of
20 Massachusetts?

15:08:57 A. .

15:08:59 Q. I'm not asking with reference to a
23 particular document. I'm asking if you've read
24 the complaint that's been filed for you in
25 Federal district court of Massachusetts?

15:09:09 A. I don't remember.

15:09:10 Q. Do you know who filed the complaint
3 for you in Federal district court in
4 Massachusetts?

15:09:19 A. I don't remember.

15:09:21 Q. Do you know if a complaint had been
7 filed for you in the Federal district court of
8 Massachusetts?

15:09:24 A. I don't know.

15:09:25 Has been.

15:09:26 .

15:09:28 Q. Do you know what judge is presiding
13 over the case that brings us here for you to give
14 testimony today?

15:09:33 A. No.

15:09:39 Q. Have you ever heard of the Vanguard
17 funds?

15:09:40 A. Yes.

15:09:42 Q. Do you know who a no load mutual
20 fund is?

15:09:44 A. A what?

15:09:45 Q. A no load mutual fund?

15:09:46 A. No.

15:09:48 Q. Do you know what a load style
25 mutual fund is?